

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LORD ABBETT AFFILIATED FUND, INC.; LORD ABBETT SERIES FUND, INC. - GROWTH & INCOME PORTFOLIO; LORD ABBETT SERIES FUND, INC. - CLASSIC STOCK PORTFOLIO; LORD ABBETT RESEARCH FUND, INC. - LORD ABBETT CALIBRATED DIVIDEND GROWTH FUND; LORD ABBETT SECURITIES TRUST - LORD ABBETT FUNDAMENTAL EQUITY FUND; and LORD ABBETT GLOBAL FUND, INC. - LORD ABBETT MULTI-ASSET GLOBAL OPPORTUNITY FUND,

Plaintiffs,

v.

AMERICAN INTERNATIONAL GROUP, INC., et al.,

Defendants.

Case No. 15-CV-00774 (LTS) (DCF)

DECLARATION OF MITCHELL M.Z. TWERSKY

I, MITCHELL M.Z. TWERSKY, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a partner of the law firm Abraham, Fruchter & Twersky, LLP, counsel for Plaintiffs Lord Abbett Affiliated Fund, Inc.; Lord Abbett Series Fund, Inc. - Growth & Income Portfolio; Lord Abbett Series Fund, Inc. - Classic Stock Portfolio funds; Lord Abbett Research Fund, Inc. - Lord Abbett Calibrated Dividend Growth Fund; Lord Abbett Securities Trust - Lord Abbett Fundamental Equity Fund; and Lord Abbett Global Fund, Inc. - Lord Abbett Multi-Asset Global Opportunity Fund. I am an attorney admitted to practice before this Court, and I respectfully submit this declaration in support of the Plaintiffs' Opposition To Joint Motion To Dismiss and Opposition to Defendants Joseph Cassano's and Andrew Forster's Motions to Dismiss, filed in in the above-captioned action.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiffs' Omnibus Opposition To Defendants' Joint Omnibus Motion To Dismiss On Timeliness Grounds filed in *Kuwait Investment Authority v. American International Group, Inc.*, No. 11-cv-08403-LTS-DCF (S.D.N.Y. March 6, 2015) (Dkt. 53), as well as in other actions brought on behalf of plaintiffs that have excluded themselves from the settlement class in *In re American International Group, Inc. 2008 Sec. Litig.*, No. 08-cv-4772 (S.D.N.Y.).

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs' Memorandum Of Law In Opposition To Defendants' Motions To Dismiss The Corrected Complaint filed in *British Coal Staff Superannuation Scheme v. American International Group, Inc.*, No. 12-CV-4555(LTS)(DCF) (S.D.N.Y. March 6, 2015) (Dkt. 63).

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' Omnibus Memorandum Of Law In Opposition To Defendant Joseph Cassano's Motion To Dismiss filed in

Kuwait Investment Authority v. American International Group, Inc., No. 11-cv-08403-LTS-DCF (S.D.N.Y. March 6, 2015) (Dkt. 51), as well as in other actions brought on behalf of plaintiffs that have excluded themselves from the settlement class in *In re American International Group, Inc. 2008 Sec. Litig.*, No. 08-cv-4772 (S.D.N.Y.).

5. Attached hereto as Exhibit D is a true and correct copy of Plaintiffs' Omnibus Memorandum Of Law In Opposition To Defendant Andrew Forster's Motion To Dismiss filed in *Kuwait Investment Authority v. American International Group, Inc.*, No. 11-cv-08403-LTS-DCF (S.D.N.Y. March 6, 2015) (Dkt. 52), as well as in other actions brought on behalf of plaintiffs that have excluded themselves from the settlement class in *In re American International Group, Inc. 2008 Sec. Litig.*, No. 08-cv-4772 (S.D.N.Y.).

Executed on this 14th of May, 2015, in New York, New York.

By: /s/ Mitchell M.Z. Twersky
Mitchell M.Z. Twersky